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Proposed Attorneys for
The Roman Catholic Archbishop of San Francisco

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re:
THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**NOTICE OF HEARING ON MOTION
FOR AN ORDER ESTABLISHING
PROCEDURES AND AUTHORIZING
PAYMENT OF PROFESSIONAL FEES
AND EXPENSES ON A MONTHLY
BASIS**

Date: October 12, 2023
Time: 1:30 p.m.
Place: Via ZoomGov
Judge: Hon. Dennis Montali

NOTICE IS HEREBY GIVEN that the Roman Catholic Archbishop of San Francisco,
Debtor and Debtor-in-Possession herein ("Debtor"), has filed a *Motion for an Order Establishing*

1 *Procedures and Authorizing Payment of Professional Fees and Expenses on a Monthly Basis* (the
2 “Motion”) and that a hearing on the Motion is scheduled before the Honorable Dennis Montali on
3 October 12, 2023, at 1:30 p.m. at the United States Bankruptcy Court, Northern District of
4 California, San Francisco Division, before the Honorable Dennis Montali (the “Hearing”). The
5 Hearing will not be conducted in the presiding judge’s courtroom but instead will be conducted by
6 videoconference via ZoomGov. The Bankruptcy Court’s website provides information regarding
7 how to arrange an appearance at a video or telephonic hearing. If you have questions about how to
8 participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or
9 by using the Live Chat feature on the Bankruptcy Court’s website. The link to the judge’s electronic
10 calendar is: <https://www.canb.uscourts.gov/judge/montali/calendar>.

11 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of*
12 *Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [Dkt 14],
13 the *Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and Debtor’s Emergency*
14 *Motions* [Dkt 15], the *Declaration of Paul J. Pascuzzi* and the *Declaration of Barron L. Weinstein*
15 in support of the Motion in support thereof, and the court’s filings and records in this case.

16 The Debtor hereby proposes that the estate’s Professionals employed by the Debtor or the
17 Committee be paid pursuant to the following procedures:

18 1. On or before the 20th day of each month, any of the Professionals seeking payment
19 from the bankruptcy estate may submit to the Debtor an invoice for fees and expenses incurred in
20 the previous month or earlier. No invoices received after the 20th will be considered for payment
21 until the following month. At the time each Professional submits their invoice, the Professional
22 shall file a copy of the invoice with the Court and send a copy to (a) the attorneys for the Debtor;
23 (b) the attorneys for and the chairperson of the Creditors Committee; (c) the United States Trustee;
24 and (d) all parties requesting special notice who have elected to receive notice electronically via
25 ECF or otherwise (collectively, the “Notice Parties”). The Professionals may each redact their
26 invoices as they may deem reasonably necessary.

27 2. Any Notice Party who objects to payment of a particular invoice shall within 14
28 days of service of the invoice, file with the court and serve on the Professional requesting payment

1 and the Notice Parties, a written objection to all or part of the fees or expenses requested in the
2 invoice. Such objection must clearly identify the time entry or entries objected to, the basis for
3 the objection, and the amount of fees or costs objected to in dollars or time. In the event an
4 objection is filed, the Debtor shall not pay the portion of the fees objected to without further order
5 of the Court.

6 3. After the period for filing objections has passed, the Debtor shall be authorized and
7 directed to pay an amount up to 80% of the fees and 100% of the expenses that are not subject to
8 any objections. Professionals who have received retainers may continue to hold such retainers
9 and receive payment from the Debtor without first exhausting such retainer before they are entitled
10 to payment.

11 4. On or before January 31, 2024, each Professional who has received, or who intends
12 to receive compensation for services rendered for the period of the Petition Date through
13 December 31, 2023, shall file with the Court and serve on the Notice Parties an interim fee
14 application pursuant to §331 and in the form required by the Federal Rules of Bankruptcy
15 Procedure and local rules of the Bankruptcy Court (“Interim Fee Application”). Thereafter, each
16 Professional who has received, or who intends to receive compensation for services rendered for
17 subsequent periods, shall file Interim Fee Applications for each four (4) month period beginning
18 January 1, 2024 (*e.g.*, January 1, 2024, through April 30, 2024; May 1, 2024, through August 31,
19 2024, etc.) during the period this case remains open. Each such application shall include all fees
20 and expenses incurred during the previous four months whether or not the fees were paid pursuant
21 to the monthly payment procedure contemplated by this Motion.

22 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
23 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
24 For further specifics concerning the Motion and the relief requested, you are encouraged to review
25 the Motion and the supporting evidence, including the supporting Declarations, copies of which
26 may be obtained from the website to be maintained by the Debtor’s proposed Claims and Noticing
27 Agent, Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/RCASF>, free of charge.
28 You may also access these documents from the Court’s Pacer system (requires a subscription). The

1 web page address for the United States Bankruptcy Court for the Northern District of California is
2 <http://www.canb.uscourts.gov>.

3 The Bankruptcy Court's website provides information regarding how to arrange a
4 telephonic or video appearance. Counsel, parties and other interested parties may attend the hearing
5 in person or by Zoom. Additional information is available on Judge Montali's Procedures page on
6 the court's website. Information on attending the hearing by Zoom will be provided on Judge
7 Montali's calendar posted on the court's website. The link to the judge's electronic calendar is:
8 <https://www.canb.uscourts.gov/judge/montali/calendar>.

9 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be
10 in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-
11 referenced addresses so as to be received by October 5, 2023. Any opposition or response must be
12 filed and served on the Limited Service List as provided in the Interim Order Approving Motion to
13 (1) Establish Notice Procedures, (2) File Confidential Information Under Seal, and (3) Temporarily
14 Suspend Deadline for Filing Proofs of Claim at Dkt 38. The updated Limited Service List may be
15 obtained from the Omni website listed above. Failure to file timely opposition and appear at the
16 hearing may constitute a waiver of your objections. Your rights may be affected. You should read
17 these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.
18 If you do not have an attorney, you may wish to consult one.

19 Dated: September 19, 2023

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

21
22 By: /s/ Jason E. Rios
JASON E. RIOS
23 Proposed Attorneys for The Roman
Catholic Archbishop of San Francisco,
24 a California corporation sole